

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

UNITED STATES OF AMERICA	:	1:06CR468-1
	:	
v.	:	
	:	MOTION BY UNITED STATES
RICHARD NORMAN WILLIAMS	:	FOR A DETENTION HEARING

NOW COMES the United States of America, by and through Anna Mills Wagoner, United States Attorney for the Middle District of North Carolina, and respectfully moves this Court to hold a detention hearing in the above-captioned case, and in support thereof states to the Court the following:

The defendant is charged in the above-captioned case with sexual abuse of a minor, in violation of Title 18, United States Code, Section 2243(a), enticement of a minor, in violation of Title 18, United States Code, Section 2422(b), and sexual exploitation of a child, in violation of Title 18, United States Code, Section 2251(a).

The case in which the above-captioned defendant stands accused involves:

- X a. a crime of violence;
- b. an offense for which the maximum sentence is life or death;
- c. an offense for which a maximum term of imprisonment of ten years or more is prescribed in the Controlled Substances Act, Title 21, United States Code, Section 801, et seq., the Controlled Substances Import and

Export Act, Title 21, United States Code, Section 951, et seq., or the Maritime Drug Law Enforcement Act, Title 46, United States Code, Appendix 1901, et seq.; or

- _____ d. a felony committed after the defendant has been convicted of two or more prior offenses described in (a) through (c) above, or two or more state or local offenses described in (a) through (c) above if circumstances giving rise to federal jurisdiction had existed.

The nature and circumstances of the instant federal offense, the above-captioned defendant's arrest, and/or the above-captioned defendant's criminal record indicate the existence of:

- _____ a. a serious risk that the defendant will flee;
- X b. a serious risk that the defendant will endanger the safety of any other person or the community; or
- _____ c. a serious risk that the defendant will obstruct or attempt to obstruct justice, or threaten, injure, or intimidate or attempt to threaten, injure, or intimidate a prospective witness or juror.

WHEREFORE, the United States respectfully requests that the Court hold a detention hearing in the above-captioned case and that it continue the detention hearing for a reasonable period of

time from the date of the defendant's first appearance before a judicial officer to allow the United States to prepare.

This the 13th day of December, 2006.

Respectfully submitted,

ANNA MILLS WAGONER
UNITED STATES ATTORNEY

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing MOTION FOR A DETENTION HEARING was served upon the person(s) hereinafter named, either personally or by placing the same in the United States Mail, this the 13th day of December, 2006, addressed as follows:

Addressee:

Locke T. Clifford
Attorney at Law
415 W. Friendly Avenue
Greensboro, NC 27401

Respectfully submitted,

ANNA MILLS WAGONER
UNITED STATES ATTORNEY

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